

STATE OF INDIANA)
) SS:
 COUNTY OF CLARK)
 CAUSE NO.:

CAROL BISINGER)
)
 Plaintiff)
)
 v.)
)
 WAL-MART STORES EAST, LP)
)
 Defendant)

COMPLAINT AND JURY DEMAND

Plaintiff, Carol Bisinger, by counsel, states as follows for her Complaint:

1. Plaintiff Carol Bisinger permanently resides and is domiciled in Clark County, Indiana.
2. At all relevant times, Defendant Wal-Mart Stores East, LP was a Foreign Delaware Limited Partnership with a principle office located at 708 SW 8th Street, Bentonville, AR 72716 that owned, controlled, and maintained a department store located at 1351 Veterans Parkway, Clarksville, IN 47129 acting by and through its owners, partners, managers, employees, agents, and assigns.
3. This lawsuit alleges a tort injury that occurred in Clark County, Indiana, making this Court a proper venue to hear the action.
4. On or about September 12, 2018 Plaintiff was shopping at Defendant's store located at 1351 Veterans Parkway, Clarksville, IN 47129 when she tripped and fell due to a display located in an aisle way that was positioned in a way to create a hazardous condition for customers.
5. Defendant knew or should have known of the dangerous condition but failed to warn or remedy the hazard.

6. As a direct and proximate result Defendant's negligence, Ms. Bisinger sustained bodily injury.

7. As a direct and proximate result of her injuries, Plaintiff incurred or expects to incur the following: past and future medical bills and related expenses, past and future pain, suffering, and inconvenience, and permanent impairment.

WHEREFORE, Plaintiff demands judgment in her favor against Defendant Wal-Mart Stores East, LP and compensatory damages, as shown by the evidence, for the following: past and future medical bills and related expenses, past and future pain, suffering, and inconvenience, and permanent impairment.

Plaintiff further demands **TRIAL BY JURY**, judgment interest (where allowed by law) costs and expenses (where allowed by law), and any other relief the Court believes just and proper.

s/ Brandon W. Smith
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JURY DEMAND

Pursuant to TR 38(B), Plaintiff demands trial by jury on all triable issues.

s/ Brandon W. Smith